

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Sharon Wilson

Plaintiff,

V.

**Xtra Helping Hands Healthcare
Provider, Inc., et al.,**

Defendants.

Case No. 1:19-cv-02062

Judge Pamela Barker

**STIPULATION OF SETTLEMENT
AND JOINT MOTION TO EXTEND
TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT**

IT IS HEREBY STIPULATED by and between parties hereto through their respective attorneys that the parties to this lawsuit, Plaintiff, Sharon Wilson (“Plaintiff”), and Defendants, Xtra Helping Hands Healthcare Provider, Inc. and Dreamer J. Sanders (together, “Defendants”), have agreed upon the general terms of a settlement to globally resolve this lawsuit, although the settlement has not yet been finalized in a written agreement. As such, given that Defendants have not yet responded to Plaintiff’s Complaint, the parties respectfully request that that Court grant Defendants additional time to answer or otherwise respond to Plaintiff’s Complaint in order to allow the parties sufficient time to finalize and sign a written settlement agreement. The parties request a 30-day extension for Defendants to answer or otherwise respond to Plaintiff’s Complaint, extending the deadline to Monday, December 9, 2019.

A proposed Order granting Defendants an additional 30 days to respond to Plaintiff's Complaint is attached hereto for the Court's convenience.

Respectfully Submitted,

/s/ Mason A. Pesek

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**PROPOSED ORDER GRANTING
JOINT MOTION TO EXTEND TIME
FOR DEFENDANTS TO RESPOND
TO COMPLAINT**

This matter came under consideration upon the parties' Joint Motion to Extend Time for Defendants to Respond to Complaint filed November 6, 2019. After review, the Court finds the motion well taken. Therefore, the motion is hereby granted. Defendant should answer or otherwise respond to Plaintiff's Complaint on or before Monday, December 9, 2019.

DATED:

Judge Pamela Barker

CERTIFICATE OF SERVICE

A copy of the foregoing, *Stipulation of Settlement and Joint Motion to Extend Time for Defendants to Respond to Complaint*, was filed electronically on November 6, 2019 using the Court's electronic filing system and all parties of record will be served via the Court's ECF process. Undersigned counsel will also serve a copy of the foregoing via electronic mail on the same date upon the following:

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Attorney for Defendants, Xtra Helping Hands Healthcare Provider, Inc. and Dreamer Sanders

/s/ Mason Pesek
One of the Attorneys for Plaintiff,
Sharon Wilson